

COMMENTS OF DAVID W. FREESE, K7GP
RE ELIMINATION OF MORSE CODE

NPRM&O WT Docket 05-235

TO: The Honorable, the Commissioners of the Federal Communications Commission

The Commission has proposed elimination of the Morse Code proficiency element from Amateur Radio Licensing.

The undersigned strongly disagrees with such proposed licensing structure change.

The advantages of Morse Code under certain conditions are well known (the following, however, is not an exhaustive list):

1. Ability to be received and deciphered under the most marginal of band conditions, where other modes are incapable. In fact, a skilled radio telegrapher can discern a message where only the noise is being modulated. This capability extends even with respect to heavy QRM and QRN.
2. Ability to be received and deciphered with very low power levels. The undersigned's first DX contact was with a Heathkit HW-8 with a phenomenal 2.5 watts output [and not a very good antenna, either]!
3. By its very nature, voice language barriers are nearly non-existent. There are no accent problems. With the Q signals a very complete and robust conversation may be had with language differences notwithstanding.
4. Morse Code is extremely parsimonious in the use of band space. A moderately paced conversation of 20 wpm would consume only 80 Hz.
5. A CW Transmitter and Receiver is much more simple to design and build than one for more complex modes.

Morse Code forms a bridge to our past. When the undersigned was first licensed in 1976, one of the members of the local radio club was a gentleman who used a spark gap transmitter back at the inception of radio!

There is an almost inexpressible phenomenon of hearing syllable and words when receiving code speed reaches the high 20s wpm. After obtaining such ability there is a satisfaction of competence rarely experienced in any other venue.

Most fundamentally, while Morse Code skills may not be the appropriate criterion for license classes less than Extra, it is and should remain so for the Extra Class License.

The Extra Class License has for decades had an extra 25 KHz at the bottom of the amateur band(s), where spectrum-consuming modes are not allowed. If Morse Code is eliminated, how should a codeless Extra employ use of that Extra allocation?

The Extra class license has always been the privileged and honored class because of the greatest requirements to obtain that class of license.

Elimination of Morse Code for the Extra Class License is squarely and precisely an instance of 'dumbing down'.

The extremity of lack of requirements for a license or privilege grant is the CB Service. As a responsible parent I will not allow any of my children to listen to such offal. The FCC's abandonment of regulation and enforcement of regulation has created a vacuum into which vacuum the very worst of degeneracy has been drawn and there finds an avenue for expression of everything repulsive and odious.

Lessening of requirements whereby we are all rendered equal obliterates the incentives for skill acquisition.

Retention of the Morse Code requirement for the Extra Class license will not

1. Deter anyone from obtaining a lesser class license;
2. Preserves the incentive to maintain a skill which historically has been very useful and which remains very useful;
3. Forms a bridge with our past, and
4. Retains the distinctiveness of an Amateur Extra Class Radio Operator in contradistinction to a mere 'appliance operator'.

DATED: October 25, 2005.

/s/ David W. Freese, K7GP